

Hearing Date and Time: February 27, 2013 at 2:00 p.m. (prevailing Eastern Time)

Objection Deadline: February 20, 2013 at 4:00 p.m. (prevailing Eastern Time)

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Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
:
Residential Capital, LLC, et al., : Case No. 12-12020 (MG)
:
Debtors. : Jointly Administered
:
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**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO PRECLUDE THE DEBTORS FROM OFFERING ANY EVIDENCE
OF THEIR RELIANCE ON COUNSEL FOR ADVICE CONCERNING THE
EVALUATION, NEGOTIATION OR APPROVAL OF THE RMBS SETTLEMENT**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On February 13, 2013, the Official Committee of Unsecured Creditors (the “**Committee**”) of the above captioned debtors and debtors-in-possession filed the Motion of the Official Committee of Unsecured Creditors to Preclude the Debtors from Offering Any Evidence of Their Reliance on Counsel for Advice Concerning the Evaluation, Negotiation or Approval of the RMBS Settlement (the “**Motion**”).

2. A hearing (the “**Hearing**”) to consider the Motion shall take place on **February 27, 2013 at 2:00 p.m. (prevailing Eastern Time)** before the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 501 of the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York, 10004.

3. Any objections to the Motion must be made in writing, filed with the Court (with a copy to Chambers) and served in accordance with the Order Under Bankruptcy Code Sections 102(1), 105(a) and 105(d), Bankruptcy Rules 1015(c), 2002(m) and 9007 and Local Bankruptcy

Rule 2002-2 Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. 141] (the “**Case Management Order**”), and served upon the Monthly Service List, as that term is defined in the Case Management Order, so as to be actually received no later than **February 20, 2013 at 4:00 p.m. (prevailing Eastern Time)**.

4. If no objections to the Motion are timely filed and served on or before the Objection Deadline, the Committee may submit to the Bankruptcy Court an order substantially in the form of the proposed order attached to the Application as **Exhibit A** (the “**Proposed Order**”).

5. A Copy of the Application can be obtained or viewed for a fee via PACER at www.pacer.gov or (without charge) on the Debtors’ restructuring website at www.kccllc.net/rescap.

Dated: February 14, 2013
New York, New York

/s/ Kenneth H. Eckstein

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